

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

RONALD KOONS, *et al.*

*Plaintiffs*

V.

WILLIAM REYNOLDS, *et al.*

### *Defendants*

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AARON SIEGEL, *et al.*

*Plaintiffs,*

V.

MATTHEW PLATKIN, *et al.*

*Defendants.*

Civil Action No. 1:22-cv-07464-  
RMB-AMD

## CIVIL ACTION

**(ELECTRONICALLY FILED)**

## CONSOLIDATED ACTIONS

**DECLARATION OF DANIEL L. SCHMUTTER IN SUPPORT OF  
*SIEGEL* PLAINTIFFS' MOTION FOR LEAVE TO FILE  
ADDITIONAL SUPPLEMENTAL PAPERS IN FURTHER SUPPORT  
OF THEIR MOTION FOR PRELIMINARY INJUNCTION**

1. I, Daniel L. Schmutter, am an attorney of the State of New Jersey and a member of Hartman & Winnicki, P.C., attorneys of record for the *Siegel* Plaintiffs in the above-titled action. I have personal knowledge of the facts set forth herein and, if called and sworn as a witness, could and would testify competently thereto. I

submit this certification in support of *Siegel* Plaintiffs' Motion for leave to file additional supplemental papers in further support of their motion for a preliminary injunction.

**Division of Gaming Enforcement - OPRA**

2. Late yesterday evening I learned of documents that were produced to a member of Plaintiff Association of New Jersey Rifle & Pistol Clubs, Inc., Kenneth Armellino, by the New Jersey Division of Gaming Enforcement (the "Division") pursuant to New Jersey's Open Public Records Act.

3. The documents produced include emails between Gaming Enforcement Director David Rebuck and (1) the attorney for the Casino Association of New Jersey regarding as of then proposed language regarding a handgun prohibition bny the casinos and (2) the General Counsel of Resorts Casino Hotel.

4. These emails demonstrate clear cooperation and coordination between the Division and the casinos with respect to the so-called "independent" prohibition of handgun carry by the casinos themselves.

5. These emails plainly undermine Defendants' position on standing with respect to Chapter 131 Section 7(a)(18) and only came to my attention late last night. Therefore *Siegel* Plaintiffs respectfully request that the Court allow this late filing.

**Filming Locations - The Walking Dead at the Monmouth Mall**

6. The Third Supplemental Declaration of Plaintiff Jason Cook reveals that, just this past Saturday, he inadvertently came upon a film set for The Walking Dead at the Monmouth Mall in Middletown New Jersey. In light of Defendants' steadfast attempts to defeat standing and avoid a decision on the merits of Chapter 131 Section 7(a)(23), this event several days ago has bearing on Defendants' position. Therefore, Siegel Plaintiffs respectfully request that the Court allow this late filing.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed within the United States.

s/ Daniel L .Schmutter  
Daniel L. Schmutter

March 16, 2023  
Date